

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

BRENDA K. HURSTON

: CASE NO. C-1-01-313

Plaintiff

: Judge Weber; Timothy S. Black, M.J.

-vs-

**BUTLER COUNTY DEPT. OF
JOB AND FAMILY SERVICES**

:

Defendants

**PLAINTIFF, BRENDA HURSTON'S
REQUEST FOR PRODUCTION OF
DOCUMENTS, THINGS, AND
BUSINESS RECORDS**

_____:

Brenda K. Hurston
1812 Grand Avenue
Middletown, OH 45044
PH-513-420-9692



July 23, 2004

VIA CERTIFIED MAIL

Jack C. McGowan
Attorneys at Law
246 High Street
Hamilton, OH 45011

Re: Brenda K. Hurston vs. Butler County Job & Family Services.

Dear Mr. McGowan:

Enclosed please find copies of Plaintiff's Motion to File Leave to Amend Witness List and Amended Witness List that is being filed with the Court. Also, enclosed please find copy of examples 1-6 and Plaintiff, Brenda Hurston's Request for Production of Documents, Things, and Business Records. Please respond within 30 days of receipt hereof to the following requests pursuant to Rule 34, Federal Rules of Civil Procedure.

Thank you for your attention, regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Brenda K. Hurston".

Brenda K. Hurston

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF AN ORDER TO COMPEL
PRODUCTION OF DOCUMENTS AND DISCOVERY**

In support of Plaintiff's motion for an order pursuant to Federal Rule 26(c) or 37(a) compelling the defendant for production of documents and discovery states that this request is necessary and reasonable so that the Plaintiff may comply with this Court's discovery order and further, to enable the Plaintiff to adequately represent herself, Pro Se.

Previous efforts to request production of documents and to schedule a time to inventory discovery(s) have been made and have been unsuccessful, attached hereto as Exhibit "3-D (1-23)".

BRENDA K. HURSTON

Brenda K Hurston

Brenda K. Hurston, Plaintiff, Pro Se
1812 Grand Ave.
Middletown, OH 45044
(513) 420-9692

CERTIFICATE OF SERVICE

I Brenda K. Hurston, hereby certify that a true and correct copy of Plaintiff's motion for and order compelling production of documents and inventory discovery has been FAXS and by regular meter mail to Jack C. McGowan, attorney for defendant, Butler County Department of Job and Family Services, 246 High Street, Hamilton, Ohio 45011 the 1st day of October, 2004.



Brenda K. Hurston, Plaintiff

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

BRENDA K. HURSTON

Plaintiff

CASE NO. C-1-01-313

Judge Timothy S. Black, M.J.

-VS-

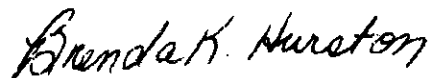
BUTLER COUNTY DEPT. OF
JOB AND FAMILY SERVICES

Defendants

MOTION AND MEMORANDUM
OF PLAINTIFF BRENDA
HURSTON FOR AN ORDER
COMPELLING DEFENDANT'S
PRODUCTION OF DOCUMENTS
AND INVENTORY DISCOVERY

Now comes Brenda K. Hurston, Plaintiff and hereby moves the Court to compel
Butler County Department of Job and Family Services, Defendant pursuant to Federal
Rule of Civil Procedure 26(c) or Rule 37(a) for Production of documents and the
inventory of plaintiff's discovery. This motion is supported by the attached
memorandum.

BRENDA K. HURSTON, PLAINTIFF



Brenda K. Hurston, Plaintiff
1812 Grand Avenue
Middletown, OH 45044
(513) 420-9692

Brenda K. Hurston
1812 Grand Ave.
Middletown, OH 45044

FAX

Date: October 1, 2004

Number of pages including cover sheet: 27

To: Karen Jones
Office of the Clerk Court
Potter Stewart U.S. Courthouse
100 East Fifth Street
Cincinnati, OH 45202
Phone: (513) 564-7500
Fax phone: (513) 564-7505

From: Brenda Hurston

1812 Grand Ave.
Middletown, OH 45044
Phone: (513) 420-9692
Fax phone: (513) 420-9692

REMARKS: Please file the attached motion. I have put a hard copy in the mail.

Thank you for your kind consideration.